101 Ash Street San Diego, CA 92101-3017



April 1, 2002

SFH 400.100.350

U.S. EPA, Region IX 75 Hawthorne Street San Francisco, CA 94105

2001 Annual PCB Report

Dear Sir or Madam:

Pursuant to 40 CFR Section 761.180, Sempra Energy is submitting the enclosed 2001 Annual Report for San Diego Gas & Electric's PCB Storage Facility (Kearny) located at 5488 Overland Avenue, San Diego, CA 92123. This Annual Report covers the 2001 calendar year for the Kearny facility.

If you have any questions regarding this report, please contact Jerry Brull at (619) 696-2417.

Sincerely,

Willis G. Brull

Senior Environmental Specialist

Enclosure

cc: California EPA

Department of Toxic Substances Control

P.O. Box 806

Sacramento, CA 95812-806

ANNUAL DOCUMENT LOG FOR THE HANDLING & DISPOSAL OF PCB CONTAMINATED MATERIALS

CALENDAR 2001

San Diego Gas & Electric Kearny PCB Facility 5488 Overland Avenue San Diego, CA 92123

EPA ID# CAD980636682

This Annual Document Log is prepared pursuant to 40 CFR 761.180

ANNUAL DOCUMENT LOG SUMMARY INFORMATION For CALENDAR YEAR 2001

CATEGORY	Total Number	Total Weight (kg)	PCB Waste (kg)
PCB Transformers (≥ 500 ppm)	52	10,991	10,991
PCB Capacitors (≥ 500 ppm)	6	287	287
Bulk PCB Articles (≥ 50 ppm)		235,118	235,118
PCB Articles (≥ 50 ppm)		448	448
PCB Containers (≥ 50 ppm)		And that	

ITEMS REMAINING IN SERVICE

•	Total Number of PCB Transformers (<u>></u> 500 ppm) <u>No estimate</u>
•	Total Weight of PCBs in PCB Transformers (kg) No estimate

- Total Number of Large PCB Capacitors No estimate

MANIFEST NUMBERS

(generated by the company during the calendar year)

See attached "Hazardous Waste Follow Up Report - SDG&E Kearny PCB Facility"

PCB SELF-INSPECTION CHECKLIST

1. Previous Inspections

If you have had previous PCB inspections, are inspection records on file and have you corrected all deficiencies that were noted in

the inspections?

Yes

Date of PCB Inspections:

January 2001 - see PCB Office

Date deficiencies corrected:

Not Applicable

2. Recordkeeping

Are the following records accurate, up-to-date, legible, and available for inspection?

PCB Annual Document Log?	40 CFR 761.180	Yes
PCB Waste Manifests?	40 CFR 761.180	Yes
Notice of PCB Activity?	40 CFR 761.205	Yes
Certificates of Disposal?	40 CFR 761.218	Yes
PCB Transformer Inspection Logs?	40 CFR 761.30	Yes
Records of any PCB Spills?	40 CFR 761.125	Yes

3. Marking & Labeling

Are all PCB Transformers, PCB Storage Facilities, PCB Access Areas, and PCB Containers properly marked with a ML or MS label (40 CFR 761.140 and 761.45)?

Yes

4. Storage

One of the more complex and confusing areas of PCB regulations has to do with the storage of PCB wastes. The complexity is due to the interplay between federal and California state regulations. The information presented below on storage of PCB wastes (not items for reuse) will address two issues: time and physical storage criteria.

Are your PCB wastes stored in compliance with the time frames as listed below? **Yes**

Storage Time Involved

30 Days or Less

No special federal or California state permits or storage areas required.

More Than 30 Days But Less Than 90 Days

Federal regulations require a special PCB Storage Area if you are storing PCB items for more than 30 days. The PCB Storage Area will allow for storage of PCB waste for one year. The one year also includes the time for disposal of the PCB wastes (40 CFR 761.165).

More Than 90 Days But Less Than One Year

California regulations require a hazardous waste facility permit or variance if storing hazardous PCB wastes for more than 90 days. Please note: even if a company has a location that meets the federal requirements for a PCB Storage Area, you would still need a California Hazardous Waste Facility permit or variance to store PCB wastes for more than 90 days (22 CCR 66262.34).

More Than One Year

If storing PCB wastes and/or containers for more than one year, you would need both a California Hazardous Waste Facility permit and special permission from U.S. EPA (40 CFR 761.65).

If you store PCB wastes for disposal for more than 30 days, does the storage location meet the criteria as listed below (40 CFR 761.65)? **Yes**

Physical Storage Criteria for a PCB Storage Area

- Adequate roof and walls to prevent rainwater from reaching the stored PCBs and PCB items.
- An adequate floor which has continuous curbing with a minimum of six inch curb. The floor and curbing must provide a containment volume equal to at least two times the internal volume of the largest PCB articles or PCB container or 25% of the total internal volume of all PCB articles or PCB containers stored therein, whichever is greater.

- No drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to flow from the curbed area.
- Floors and curbing constructed of continuous smooth impervious materials, such as Portland cement concrete or steel, to prevent or minimize penetration of PCBs.
- Not located at a site that is below the 100-year floodwater elevation.

5. Spills

Have all PCB spills and leaks been cleaned up in a timely manner and the appropriate agencies been notified (40 CFR 761.125)?

Yes

Spills of PCBs can vary from transformer drips to large spills that pose an immediate threat to public health and safety. The important issues regarding spills and compliance are 1) cleanup and 2) timely reporting of the spills. Cleanup levels vary depending on the location of the spill, type of surface involved, concentration of PCBs, future use of the property, etc. Reporting requirements for spills can be as soon as within 24 hours of the spill (40 CFR 761.125).

6. PCB Transformers and Capacitors

If you have PCB Transformers and/or PCB high or low voltage capacitors (either in use, storage for reuse, or storage for disposal), are they in a location that does not pose an exposure risk to food or feed (40 CFR 761.30)?

Yes

7. Miscellaneous

Have you avoided servicing or rebuilding any electromagnet, switch or voltage regulator with a PCB concentration ≥ 500 ppm that would require the removal and rework of the internal components (40 CFR 761.30)? **Yes**

Have you avoided using waste oil with a PCB concentration ≥ 2 ppm as a sealant, coating, or dust control (40 CFR 761.30)? **Yes**

HAZARDOUS WASTE FOLLOW UP REPORT - SDG&E KEARNY PCB FACILITY

						CERTIFICATE OF DESTRUCTION					
Manifest Number Ship D	Ship Date	Sent To Document Number	Received Date	Number	Date	Number	Date	Number	Date	All	
995801029	01/18/01	SAL	00006	01/19/01	60897	01/19/01				*******	
99581032	01/22/01	SAL	00002	01/25/01	62025	01/29/01					
99581055	05/02/01	APU	00027	05/04/01							
99581075	07/17/01	APU	00042	07/18/01	166636	08/21/01					
99581091	08/28/01	SAL	00048	09/01/01	87301	09/17/01					
20843869	10/29/01	APU	00066	10//30/01							
20843876	11/13/01	SAL	00071	11/19/01	56716	11/26/01					
20843883	12/19/01	APU	00076	12/28/01							
20843884	12/19/01	SAL	00077	12/20/02	0588	12/27/01					
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APU - Safety-Kleen (Aragonite), Inc. SAL - Salesco Systems U.S.A., Inc.